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BEFORE THE
Federal Communications Commission

WASHINGTON, D. C.

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FILE

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Federal Communications Commission
Office of the Secretary

In the Matter of)

Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)

Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)

Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements of Part 73 of the)
Commission's Rules)

To the Commission:)

MM Docket No. 87-268
RM-5811

COMMENTS OF METROVISION, INC.,
NEWCHANNELS CORPORATION, AND
SAMMONS COMMUNICATIONS, INC.

MetroVision, Inc., NewChannels Corporation, and
Sammons Communications, Inc. ("the Joint Parties") by their
attorneys, hereby submit their comments in response to the
Commission's Notice of Inquiry ("Notice") in the above-
captioned proceeding.

Recognizing that the future of television service
will be greatly affected by the development of advanced
television systems ("ATV"), the Commission has initiated this
comprehensive inquiry to consider "the technical and public
policy issues surrounding the use of advanced television

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technologies by television broadcast licensees."^{1/} While the Joint Parties commend the Commission for commencing this proceeding, they submit that limiting this Commission inquiry to the impact of ATV (and in particular HDTV) on conventional broadcast licensees ignores significant providers of video service that will be equally affected by introduction of the new technologies. Television broadcast stations are no longer the sole providers of video service to the public. Cable television, microwave services, satellite delivered services, video discs and video cassettes all currently provide viewers with television programming,^{2/} and will all be affected by the introduction of HDTV.

Because of their roles in providing the public with television programming, each of these industries should be

^{1/} Notice of Inquiry, MM Docket No. 87-268, 2 FCC Rcd 5125, 5126 (1987) ("Notice"). The Notice defines advanced television systems to include various technologies that improve television audio and video quality beyond that currently available under the NTSC system. These comments focus primarily on the concerns raised by introduction of high definition television ("HDTV") which is encompassed in the definition of ATV.

^{2/} The Commission has recently recognized the coequal and independent status of the cable industry. In adopting the new must carry rules the Commission concluded that "it is no longer appropriate or desirable to treat cable as an auxiliary video distribution service. . . ." Must Carry Rules, 61 R.R.2d 792, 827 (1986). "[T]he cable industry is now a full-fledged video service providing consumers with alternative programming services that are competitive with the services of broadcast stations." Id. at 825. Consistent with this acknowledged competitive role, the cable industry deserves full consideration in the formulation of Commission standards regulating future television service.

involved in formulating standards for the operation of HDTV. For this reason, the Joint Parties unequivocally endorse the position adopted in comments filed this date on behalf of the National Cable Television Association ("NCTA"). The Joint Parties write separately to emphasize the prominent role that other providers of television programming, and in particular operators of cable television systems, will have in the future provision of television service, and the consequential far reaching impact of Commission standards for the introduction of HDTV.

HDTV is still in the early stages of development and as a result, significant issues concerning the introduction of HDTV have yet to be addressed.^{3/} The Commission should therefore refrain from acting prematurely, at a time when neither the full potential nor the full industry impact of HDTV can be evaluated. NCTA is coordinating industry-wide efforts to provide technical and policy assessments of current HDTV systems. With input from these studies, the Commission could, in the near future, develop ATV standards based on the recommendations of the industry as a whole.


^{3/} The NCTA Comments highlight an unresolved issue of particular concern to cable operators. It is unclear whether cable systems will be able to retransmit a high quality signal under each of the HDTV systems now under consideration.

CONCLUSION

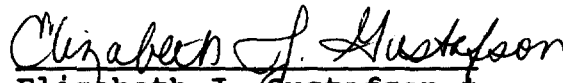
The Joint Parties commend the Commission for its recognition of the tremendous impact of the introduction of ATV. In light of that recognition, they urge the Commission to consider the full range of interests potentially affected by this new technology and to resolve the involved issues in a manner consistent with these comments and those of NCTA.

Respectfully submitted,

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